

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\*\*\*\*\*

IN RE: : CHAPTER 13  
JULIA A. MARINEZ :  
Debtor(s) : CASE NO. 5-19-00219

\*\*\*\*\*

**OBJECTION TO CERTIFICATION OF DEFAULT**

\*\*\*\*\*

NOW COMES, Julia A. Marinez, the above Debtor, by and through his counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On June 08, 2022, a Motion to Dismiss due to material default was filed.
2. On December 14, 2022, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments were made and/or ascertain if Debtor is in possession of the funds needed to cure the arrears.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: December 14, 2022

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID #59887  
Counsel for Debtor  
381 N. 9<sup>th</sup> Avenue  
Scranton, Pa 18504

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\*\*\*\*\*

IN RE: : CHAPTER 13  
JULIA A. MARINEZ :  
Debtor(s) : CASE NO. 5-19-00219

\*\*\*\*\*

**CERTIFICATE OF SERVICE**

\*\*\*\*\*

The undersigned hereby certifies that on December 14, 2022 he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com\_

Date of Mailing: December 14, 2022 /s/Tullio DeLuca  
Tullio DeLuca, Esquire